

REMARKS

Upon entry of the foregoing amendments, claims 1, 2, 4-10, 12-20, 22-27, 29-31, 39-41, and 43 are pending in the application. Claims 3, 11, 21, 28, 32-38, and 42 are cancelled without prejudice to or disclaimer of the subject matter therein. Claim 44 was previously cancelled. Claims 1, 4, 9, 12, 18, 25, 39 are being amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

Claims 1-31 were rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Patent No. 5,892,535 to Allen *et al.* (“Allen”). Applicants respectfully traverse this rejection.

For the Examiner's convenience, amended claim 1 is reproduced below.

1. An apparatus for transmitting uncompressed video data across a network, comprising:
 - a video input that receives an uncompressed video signal;
 - a video predictive coding module coupled to the video input, wherein the video predictive coding module performs video predictive coding on the video signal in real time to create a video predictive coded signal; ~~and~~
 - a delay module coupled to the video input to delay a line of the uncompressed video signal;
 - a subtraction module coupled to the delay module, wherein the subtraction module subtracts a subsequent line of the video signal from the delayed line of the video signal; and
 - a network interface coupled to the video predictive coding module and coupled to the network, wherein the network interface transmits the video predictive coded signal across the network concurrently with the video predictive coding module performing video predictive coding in real time.

Allen does not anticipate claim 1 because it does not teach or suggest each and every element of claim 1. Specifically, Allen does not teach or suggest “a subtraction module coupled to the delay module, wherein the subtraction module subtracts a subsequent line of the video signal from a delayed line of the video signal,” as recited in claim 1. In rejecting the above

features, Examiner cited Col. 29, lines 43-53 of Allen. However, the cited portion of Allen is directed to transmitting packetized data using communication protocols such as FDDI, RS232, and ATM/OC-3. *See* Col. 29, lines 43-53. Nowhere does Allen teach or suggest an MPEG-2 subtractor. Allen also does not teach or suggest using a subtractor to subtract a subsequent line of the video signal from a delayed line of the video signal. Accordingly, claim 1 is patentable over Allen for at least these reasons.

Independent claims 9, 18, 25, and 39 have been amended to recite similar features as distinguished above with respect to claim 1. Amended claim 9 recites, in part, “a delay module coupled to the subtraction module, wherein the subtraction module subtracts a subsequent line of the video predictive coded signal from a line of the video predictive decoded signal delayed by the delay module.” Amended claim 18 recites, in part, “subtracting a second line of the composite video signal from the first line of the composite video signal to create the video predictive coded video signal.” Amended claim 25 recites, in part, “subtracting a second line of the composite video signal from the first line of the composite video signal to create the video predictive coded video signal.” Amended claim 39 recites, in part, “subtracting a second line of the multimedia signal from the delayed first line of the multimedia signal to create the video predictive coded multimedia signal.” Accordingly, claims 9, 18, 25, and 39 are also patentable over Allen for at least the same reasons with respect to claim 1.

Claims 2, 4-8, 10, 12-17, 19, 20, 22-24, 26, 27, and 29-31 depend from one of independent claims 1, 9, 18, 25, and 39. They are thus patentable over Allen for at least the reasons provided above and further view of their own distinguishing features. Applicants therefore respectfully request that the Examiner reconsider and withdraw the rejection of those claims.

Rejections under 35 U.S.C. § 103

Claims 32-43 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Allen in view of U.S. Patent No. 6,181,711 to Zhang *et al.* (“Zhang”). Claims 32-38 have been cancelled, thereby rendering the rejection to those claims moot.

Zhang does not provide the teachings missing from Allen for at least the reasons discussed above with respect to claims 1 and 39. Particularly, Zhang does not teach or suggest “subtracting a second line of the multimedia signal from the delayed first line of the multimedia

signal to create the video predictive coded multimedia signal,” as recited in claim 39. Accordingly, claim 39 is patentable over Allen and Zhang, considered alone or in combination. Claims 40, 41, and 43 depend from claim 39 and are thus patentable over Allen and Zhang, alone or in combination, and further view of their own distinguishing features. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 39-41 and 43.

CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to Deposit Account No. 18-1953 referencing Docket No. 13CN-126433. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

Dated: September 28, 2007

Respectfully submitted,

By: 

Young A. Tang

Registration No.: 55,665

SHEPPARD MULLIN RICHTER &
HAMPTON LLP
333 South Hope Street, 48th Floor
Los Angeles, CA 90071-1448
Telephone: (858) 720-8900
Facsimile: (858) 509-3691